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SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415

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APPLICATION OF SOUTHWESTERN §  
ELECTRIC POWER COMPANY FOR §  
AUTHORITY TO CHANGE RATES §  
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS


**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO  
SIERRA CLUB'S THIRD SET OF REQUESTS FOR INFORMATION**

**MARCH 15, 2021**

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 Sierra\_Club\_3-1\_Attachment\_5

**SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA  
CLUB'S THIRD SET OF REQUESTS FOR INFORMATION**

**Question No. Sierra Club 3-1:**

For the Flint Creek, Welsh, and Turk units:

- a. Please produce all unit disposition studies done by the Company during the last five years and update your answers throughout this proceeding.
- b. Identify all transmission grid updates or changes that would be needed to allow for the retirement of the units.
- c. Produce all analyses or assessments of the need for the continue operations of each unit.
- d. Provide the remaining book value (plant balance) at the start of 2020.
- e. Identify the current undepreciated book value, and the expected undepreciated book value for each year of the remaining operation life of the unit.
- f. Produce all analyses or assessments of the impact that retirement of each unit would have on capacity adequacy, transmission grid stability, transmission grid support, voltage support, or transmission system reliability.

**Response No. Sierra Club 3-1:**

- a. Please see the response to CARD 7-3 for the Flint Creek and Welsh unit disposition analyses conducted in the last five years. The Company has not conducted a Turk unit disposition analyses in the last five years.
- b. Please see Sierra Club 3-1 Attachment 1 for the retirement process that would be followed by the Generating Unit Owner.
- c. Please see the supplemental response to CARD 2-10 for the analyses conducted to assess the continued operation of Flint Creek and Welsh. The Company has not conducted Turk unit disposition analyses.
- d. & e. Please see Sierra Club 3-1 Attachment 5 for the remaining net book values at 12-31-19 and 12-31-2020. The Company has not performed the requested analysis regarding undepreciated book value for each year of the remaining operation life of the units.
- f. Please see Sierra Club 3-1 CONFIDENTIAL Attachments 2-4 for applicable analyses or assessments of unit retirements that would impact capacity adequacy, transmission grid stability, transmission grid support, voltage support, or transmission system reliability.

Sierra Club 3-1 Attachments 2, 3, and 4 responsive to this request are HIGHLY SENSITIVE PROTECTED MATERIAL under the terms of the Protective Order. The Highly Sensitive information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15<sup>th</sup> Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

Prepared By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

Prepared By: William M. Romine

Title: Regulatory Consultant Staff

Prepared By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

Sponsored By: Wayman L. Smith

Title: Dir Trans Planning

Sponsored By: Michael A. Baird

Title: Mng Dir Acctng Policy & Rsrch

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

**ATTACHMENT AB  
GENERATOR RETIREMENT PROCESS**

**1.0 Introduction:** When it becomes necessary or desirable for a Generator Owner to retire a Resource, the provisions of this Attachment AB shall apply. For the purposes of this attachment, the retirement of a Resource is defined as the permanent removal and de-registration of a Resource from the Integrated Marketplace. This attachment does not apply to requests for generating facility replacement as defined in Attachment V of this Tariff.

**2.0 Submission of Study Requests for Resource Retirements:** The Generator Owner shall make a request to study the retirement of a Resource by submitting notification to the Transmission Provider no less than one year from the expected retirement date. This request shall include the Resource name, the expected retirement date, and other relevant information specified in Addendum 1 to Attachment AB. Upon notification, the Transmission Provider will also inform the SPP Market Monitor of the anticipated Resource retirement.

**3.0 Studies:** The Transmission Provider shall conduct all necessary studies associated with the retirement of a Resource. Such studies shall be conducted at Generator Owner's expense pursuant to the provisions of this section.

**3.1 Resource Retirement Screening Assessment:** Upon receipt of the request to study a Resource retirement, the Transmission Provider shall perform a preliminary screening assessment of the impact of the expected Resource retirement on the Transmission System. The Transmission Provider shall respond within 30 calendar days of receipt of such request with results of a screening assessment determining if technical analysis is required prior to the Resource retiring. If technical analysis not required by the Transmission Provider, the Generator Owner may submit its retirement notice in accordance with the SPP Market Protocols at any time.

**3.2 Transmission System Study:** If further technical analysis is required, the Generator Owner must execute a Resource Retirement Study ("RRS") Agreement to proceed with such study and provide a study deposit of \$10,000, within 30 Calendar Days of notification. If the Generator Owner fails to return an executed RRS Agreement within 30 Calendar Days along with the required deposit, the request will be deemed withdrawn.

The Transmission Provider will make a good faith effort complete the study ahead of the retirement date of the Resource. The Transmission Provider and Generator Owner will resolve issues associated with the timeframe of the study and retirement date of the Resource in accordance with Good Utility Practice.

The RRS Agreement shall commit the Generator Owner to pay the Transmission Provider the actual cost to complete the study. Upon receipt of the executed RRS Agreement and deposit, the Transmission Provider shall begin an assessment of the impact of the expected Resource retirement. During the RRS, the Transmission Provider shall assess the impacts on the Transmission System caused by the removal of a Resource using power flow, transient stability, and short circuit analyses, as appropriate. For all requests for which the Transmission Provider finds no reliability impact on the Transmission System, the RRS



will be considered complete. Undesignation and de-registration of the Resource will be required pursuant to Section 4.0 of this Attachment AB. For requests where the Transmission Provider identifies a reliability impact on the Transmission System, a long-term solution may be necessary.

Transmission Provider shall issue a study report to the Generator Owner upon completion of the RRS. If Transmission Provider is unable to complete such study in the allotted time, Transmission Provider shall provide an explanation to the Generator Owner regarding the cause(s) of such delay and a revised completion date and study cost estimate.

**3.3 Confidentiality:** The Transmission Provider will keep the information included in the retirement study request and any supporting information confidential. While analyzing the effects of the retirement on the Transmission System, additional parties including SPP Members and non-Members may be needed to participate in the scope development or mitigation development efforts described in Business Practice 7800. Those entities who participate in such efforts shall have an executed non-disclosure agreement (NDA) on file with SPP. All information and analysis communicated through such processes shall be treated as confidential until posting of the results of the Generator Retirement Process as provided in Section 3.4.

**3.4 Resource Retirement Study Completion:** Prior to inclusion of a Generator Retirement Upgrade in the SPP Transmission Expansion Plan, Transmission Provider will post the supporting RRS report publicly on SPP's website. The Generator Owner shall reimburse Transmission Provider for the unpaid cost of the RRS if the cost of the RRS exceeds the deposit. Transmission Provider shall refund to the Generator Owner any portion of the deposit that exceeds the cost of the RRS with interest earned, if any.

**3.5 Generator Retirement Upgrades:** If the Transmission Provider determines that one or more Network Upgrade(s) is necessary to address reliability impacts to the Transmission System caused by the retirement of a Resource, the Transmission Provider shall make a recommendation to the SPP Board of Directors for approval of the Generator

Retirement Upgrade(s). If a Generator Retirement Upgrade is approved for construction by the SPP Board of Directors, the Transmission Provider will issue all NTC/NTC-Cs in accordance with Attachment Y of this Tariff.

**3.6 Withdrawal of Study Request:** During the course of a RRS, the Generator Owner may withdraw its request for study of retirement of a Resource. The Generator Owner remains responsible for the study costs incurred up to the date of the withdrawal of the request.

**4.0 Resource Undesignation and De-registration:** The applicable Market Participant and all applicable Transmission Customer(s) or Network Customer(s) are responsible to take the necessary actions such that, effective no later than the retirement date, the Resource is not registered under Attachment AE and is not a Designated Resource.

**Addendum 1 to Attachment AB**

Pursuant to the Resource Retirement Process in Attachment AB of the Tariff, notice is hereby provided on \_\_\_\_\_ (date of notice) to the Transmission Provider that Generator Owner requests the study of retirement of a Resource registered in the Integrated Marketplace.

Responses marked with an asterisk (\*) are required. Supply all details that are known or projected.

**Resource Retirement Study Request**

## 1) Description of Resource\*

- a) Resource name\*
- b) Expected retirement date(s)\*
- c) Market Participant
- d) Transmission Customer
- e) Reason for the retirement (e.g., age or limited run time) \*
- f) Related transmission service agreement\*
- g) Bus Number and Unit ID\*

## 2) Other pertinent information

**Requestor Contact:**

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Email Address: \_\_\_\_\_

Voice Phone No.: \_\_\_\_\_

By: \_\_\_\_\_

(Representative of Generator Owner)

Title: \_\_\_\_\_

Date: \_\_\_\_\_

SWEPCO  
Sierra Club 3-1  
Attachment 5

Company	Major Location	Asset Location	Depr Group	Utility Account	Month	Book Cost	Accum Depreciation	Net Book Value
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Plant Railroad SEP PPFLCRR	SEP 101/6 311 Flint Creek Railroad	31100 - Structures, Improvemnt-Coal	12/2019	450,291 00	406,177 36	44,113 64
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 311 Flint Creek Plant	31100 - Structures, Improvemnt-Coal	12/2019	26,880,632.87	16,707,340 28	10,173,292 59
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 312 Flint Creek Plant	31200 - Boiler Plant Equip-Coal	12/2019	295,403,375 92	61,831,383 32	233,571,992 60
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Railcars Previously Leased SEP PPFLCPLSD	SEP 101/6 312 Flint Crk Prev-Lsd	31211 - Coal Transportation Equip	12/2019	323,023 20	323,023 20	-
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 312 Flint Creek Railcars	31211 - Coal Transportation Equip	12/2019	3,989,549 17	1,987,502 72	2,002,046 45
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 314 Flint Creek Plant	31400 - Turbogenerator Units-Coal	12/2019	15,318,616 41	9,015,640 60	6,302,975 81
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 315 Flint Creek Plant	31500 - Accessory Elect Equip-Coal	12/2019	10,970,647 42	4,869,693 55	6,100,953 87
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 316 Flint Creek Plant	31600 - Misc Pwr Plant Equip-Coal	12/2019	6,258,411 14	3,718,968 73	2,539,442 41
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 31700 Flint Crk Asbestos	31700 - ARO Steam Production Plant	12/2019	845,503 75	305,906 20	539,597 55
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	ARO#3 Flint Creek Ash Pond SEP PPFLCARO3	SEP 101/6 31700 ASH3 Flint Creek	31700 - ARO Steam Production Plant	12/2019	519,417 13	153,724 42	365,692 71
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	ARO#2 Flint Creek Ash Pond SEP PPFLCARO2	SEP 101/6 31700 ASH2 Flint Creek	31700 - ARO Steam Production Plant	12/2019	5,173,977 08	485,478 41	4,688,498 67
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	ARO#1 Flint Creek Ash Pond SEP PPFLCARO1	SEP 101/6 31700 ASH1 Flint Creek	31700 - ARO Steam Production Plant	12/2019	4,820,248 70	1,342,382 87	3,477,865 83
						<b>370,953,693 79</b>	<b>101,147,221 66</b>	<b>269,806,472 13</b>

Company	Major Location	Asset Location	Depr Group	Utility Account	Month	Book Cost	Accum Depreciation	Net Book Value
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Plant Railroad SEP PPFLCRR	SEP 101/6 311 Flint Creek Railroad	31100 - Structures, Improvemnt-Coal	12/2020	450,291 00	421,802 56	28,488 44
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 311 Flint Creek Plant	31100 - Structures, Improvemnt-Coal	12/2020	26,930,656 96	17,612,540 08	9,318,116 88
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 312 Flint Creek Plant	31200 - Boiler Plant Equip-Coal	12/2020	295,724,350 23	74,853,169 87	220,871,180 36
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Railcars Previously Leased SEP PPFLCPLSD	SEP 101/6 312 Flint Crk Prev-Lsd	31211 - Coal Transportation Equip	12/2020	323,023 20	323,023 20	-
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 312 Flint Creek Railcars	31211 - Coal Transportation Equip	12/2020	3,989,549 17	2,143,095 09	1,846,454 08
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 314 Flint Creek Plant	31400 - Turbogenerator Units-Coal	12/2020	17,698,639 78	8,761,336 05	8,937,303 73
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 315 Flint Creek Plant	31500 - Accessory Elect Equip-Coal	12/2020	11,171,314 42	5,240,661 16	5,930,653 26
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 316 Flint Creek Plant	31600 - Misc Pwr Plant Equip-Coal	12/2020	6,383,610 29	3,922,357 85	2,461,252 44
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	Flint Creek Generating Plant SEP PPFLC	SEP 101/6 31700 Flint Crk Asbestos	31700 - ARO Steam Production Plant	12/2020	845,503.75	335,073 62	510,430 13
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	ARO#3 Flint Creek Ash Pond SEP PPFLCARO3	SEP 101/6 31700 ASH3 Flint Creek	31700 - ARO Steam Production Plant	12/2020	519,417 13	172,804 06	346,613 07
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	ARO#2 Flint Creek Ash Pond SEP PPFLCARO2	SEP 101/6 31700 ASH2 Flint Creek	31700 - ARO Steam Production Plant	12/2020	4,930,413 88	727,052 34	4,203,361 54
Southwestern Electric Pwr - Gen	Flint Creek Generating Plant	ARO#1 Flint Creek Ash Pond SEP PPFLCARO1	SEP 101/6 31700 ASH1 Flint Creek	31700 - ARO Steam Production Plant	12/2020	4,820,248 70	1,524,629 09	3,295,619 61
						<b>373,787,018.51</b>	<b>116,037,544.97</b>	<b>257,749,473.54</b>

SWEP  
Sierra Club 3-1  
Attachment 5

Company	Major Location	Asset Location	Depr Group	Utility Account	Month	Book Cost	Accum Depreciation	Net Book Value
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 311 Welsh Plant	31100 - Structures, Improvemnt-Coal	12/2019	71,594,554 71	46,707,739 30	24,886,815 41
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Plant Railroad SEP PPWSHRR	SEP 101/6 311 Welsh Railroad	31100 - Structures, Improvemnt-Coal	12/2019	1,341,746 00	1,200,633 73	141,112 27
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 312 Welsh Plant	31200 - Boiler Plant Equip-Coal	12/2019	583,599,604 41	223,330,542 23	360,269,062 18
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Plant Railcars Previously Loased SEP PPWSHPLSD	SEP 101/6 312 Welsh Prev-Lsd	31211 - Coal Transportation Equip	12/2019	861,733 32	861,733 32	-
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 312 Welsh Railcars	31211 - Coal Transportation Equip	12/2019	12,114,203 10	7,091,388 01	5,022,815 09
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 314 Welsh Plant	31400 - Turbogenerator Units-Coal	12/2019	142,048,908 97	69,827,231 34	72,221,677 63
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 315 Welsh Plant	31500 - Accessory Elect Equip-Coal	12/2019	47,084,698 64	19,916,823 66	27,167,874 98
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 316 Welsh Plant	31600 - Misc Pwr Plant Equip-Coal	12/2019	21,423,993 47	15,514,838 60	5,909,154 87
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#1 Welsh Landfill SEP PPWSHARO1	SEP 101/6 31700 ASH1 Welsh	31700 - ARO Steam Production Plant	12/2019	13,524,652 01	1,301,100 20	12,223,551 81
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#2 Welsh Landfill SEP PPWSHARO2	SEP 101/6 31700 ASH2 Welsh	31700 - ARO Steam Production Plant	12/2019	11,874,519 86	1,326,751 15	10,547,768 71
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#3 Welsh Landfill SEP PPWSHARO3	SEP 101/6 31700 ASH3 Welsh	31700 - ARO Steam Production Plant	12/2019	1,040,507 21	176,032 49	864,474 72
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#4 Welsh Landfill SEP PPWSHARO4	SEP 101/6 31700 ASH4 Welsh	31700 - ARO Steam Production Plant	12/2019	3,648,821 74	502,290 12	3,146,531 62
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 31700 Welsh Asbestos	31700 - ARO Steam Production Plant	12/2019	2,820,864 90	988,310 18	1,832,554 72
						<b>912,978,808.34</b>	<b>388,745,414.33</b>	<b>524,233,394.01</b>



SWEPCO  
Sierra Club 3-1  
Attachment 5

Company	Major Location	Asset Location	Depr Group	Utility Account	Month	Book Cost	Accum Depreciation	Net Book Value
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 311 Welsh Plant	31100 - Structures, Improvemnt-Coal	12/2020	72,347,122 75	48,855,913 63	23,491,209 12
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Plant Railroad SEP PPWSHRR	SEP 101/6 311 Welsh Railroad	31100 - Structures, Improvemnt-Coal	12/2020	1,341,746 00	1,241,908 34	99,837 66
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 312 Welsh Plant	31200 - Boiler Plant Equip-Coal	12/2020	585,075,155 36	245,677,039 87	339,398,115 49
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Plant Railcars Previously Leased SEP PPWSHPLSD	SEP 101/6 312 Welsh Prev-Lsd	31211 - Coal Transportation Equip	12/2020	861,733 32	861,733 32	-
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 312 Welsh Railcars	31211 - Coal Transportation Equip	12/2020	12,114,203 10	7,535,145 39	4,579,057 71
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 314 Welsh Plant	31400 - Turbogenerator Units-Coal	12/2020	142,597,450 62	74,817,856 57	67,779,594 05
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 315 Welsh Plant	31500 - Accessory Elect Equip-Coal	12/2020	47,617,134 75	22,026,355 54	25,590,779 21
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 316 Welsh Plant	31600 - Misc Pwr Plant Equip-Coal	12/2020	22,046,941 31	15,855,442 01	6,191,499 30
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#1 Welsh Landfill SEP PPWSHARO1	SEP 101/6 31700 ASH1 Welsh	31700 - ARO Steam Production Plant	12/2020	13,524,652 01	1,932,341 42	11,592,310 59
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#2 Welsh Landfill SEP PPWSHARO2	SEP 101/6 31700 ASH2 Welsh	31700 - ARO Steam Production Plant	12/2020	1,272,911 16	1,662,163 15	(389,251 99)
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#3 Welsh Landfill SEP PPWSHARO3	SEP 101/6 31700 ASH3 Welsh	31700 - ARO Steam Production Plant	12/2020	1,040,507 21	219,795 27	820,711 94
Southwestern Electric Pwr - Gen	Welsh Generating Plant	ARO#4 Welsh Landfill SEP PPWSHARO4	SEP 101/6 31700 ASH4 Welsh	31700 - ARO Steam Production Plant	12/2020	4,072,611 10	661,134 41	3,411,476 69
Southwestern Electric Pwr - Gen	Welsh Generating Plant	Welsh Generating Plant SEP PPWSH	SEP 101/6 31700 Welsh Asbestos	31700 - ARO Steam Production Plant	12/2020	2,890,623 41	1,090,237 57	1,800,385 84
						<b>906,802,792 10</b>	<b>422,437,066 49</b>	<b>484,365,725 61</b>
Account 1080163								3,557,513 00
Remaining NBV								487,923,238.61

SWEPCO  
Sierra Club 3-1  
Attachment 5

Company	Major Location	Asset Location	Depr Group	Utility Account	Month	Book Cost	Accum Depreciation	Net Book Value
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 310 Turk Plant	31010 - Land Rights - Coal Fired	12/2019	1,886,717 17	-	1,886,717 17
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 311 Turk Plant	31100 - Structures, Improvemnt-Coal	12/2019	287,492,517 30	35,533,966 32	251,958,550 98
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SCP JWTGP	SEP 101/6 312 Turk Plant	31200 - Boiler Plant Equip-Coal	12/2019	992,441,092 03	144,231,033 05	848,210,058 98
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 314 Turk Plant	31400 - Turbogenerator Units-Coal	12/2019	232,629,873 15	35,805,500 54	196,824,372 61
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 315 Turk Plant	31500 - Accessory Elect Equip-Coal	12/2019	93,354,797 69	13,742,577 00	79,612,220 69
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 316 Turk Plant	31600 - Misc Pwr Plant Equip-Coal	12/2019	48,553,150 29	6,219,912 71	42,333,237 58
Southwestern Electric Pwr - Gen	Turk Generating Plant	ARO#1 Turk Landfill SEP JWTGPARO1	SEP 101/6 31700 ASH1 Turk	31700 - ARO Steam Production Plant	12/2019	3,669,587 92	368,003 30	3,301,584 62
						<b>1,660,027,735 55</b>	<b>235,900,992 92</b>	<b>1,424,126,742 63</b>

Company	Major Location	Asset Location	Depr Group	Utility Account	Month	Book Cost	Accum Depreciation	Net Book Value
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 310 Turk Plant	31010 - Land Rights - Coal Fired	12/2020	1,886,717 17	-	1,886,717 17
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 311 Turk Plant	31100 - Structures, Improvemnt-Coal	12/2020	288,037,323 92	41,462,485 59	246,574,838 33
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 312 Turk Plant	31200 - Boiler Plant Equip-Coal	12/2020	992,981,653 83	163,727,055 62	829,254,598 21
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 314 Turk Plant	31400 - Turbogenerator Units-Coal	12/2020	232,629,873 15	40,644,201 76	191,985,671 39
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 315 Turk Plant	31500 - Accessory Elect Equip-Coal	12/2020	93,354,797 69	15,684,356 88	77,670,440 81
Southwestern Electric Pwr - Gen	Turk Generating Plant	Turk Generating Plant SEP JWTGP	SEP 101/6 316 Turk Plant	31600 - Misc Pwr Plant Equip-Coal	12/2020	48,509,864 13	6,994,561 75	41,515,302 38
Southwestern Electric Pwr - Gen	Turk Generating Plant	ARO#1 Turk Landfill SEP JWTGPARO1	SEP 101/6 31700 ASH1 Turk	31700 - ARO Steam Production Plant	12/2020	3,669,587 92	436,667 05	3,232,920 87
						<b>1,661,069,817.81</b>	<b>268,949,328.65</b>	<b>1,392,120,489.16</b>

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**PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA**  
**CLUB'S THIRD SET OF REQUESTS FOR INFORMATION**

**Question No. Sierra Club 3-2:**

Refer to SWEPCO response to Sierra Club 1-5, Highly Sensitive Attachment 6.

- a. For each unit, indicate whether the units were modeled with an economic or a selfcommitment status for each year of the analysis. If not exclusively one or the other, state how unit commitment was modeled.
- b. Indicate the date the study was conducted.
- c. Indicate the regulation or rationale behind each of the retirement date assumption listed.
- d. Indicate the date used in this analysis, by which ELG compliance must be achieved.
- e. Indicate the date used in this analysis, by which CCR compliance must be achieved.
- f. For all scenarios indicate whether CCR compliance costs, ELG compliance costs, or both ELG and CCR costs were included or excluded.

**Response No. Sierra Club 3-2:**

- a. The units were assumed to be economically committed and dispatched in the modeling to produce the unit information found in SC 1-5 Highly Sensitive Attachment 6.
- b. Please see the response to SC 3-3 a. for the date the study was conducted.
- c. The rationale behind the retirement date assumptions is compliance with the CCR and/or ELG rules.
- d. Achieving CCR compliance at each facility listed below is dependent on future operations of the plant (cease or continue burning coal) and need for alternative disposal capacity at the plant when the CCR impoundment ceases operation. The CCR rule allows the plant to continue operating the CCR impoundment until October 15, 2023 while additional disposal capacity is provided. Flint Creek Plant will be providing additional disposal capacity and then will close the Primary Bottom Ash Pond (BAP) per the date shown below. The CCR rule also allows a plant that commits to cease burning coal to continue operating the CCR impoundments as long as the plant ceases burning coal and the CCR impoundments are closed by October 17, 2023 (plants with impoundments less than 40 acres - Pirkey) or October 17, 2028 (for impoundments 40 acres and greater - Welsh). The dates provided are based on the current individual CCR impoundment plan that was submitted to EPA for approval on November 30, 2020. The current plans are ultimately dependent on EPA approval, with the exception of the Welsh Bottom Ash Storage Pond (BASP) which will cease operation no later than April 11, 2021.

- Welsh BASP - Cease Operation and Initiate Closure by April 11, 2021
- Welsh Primary Bottom Ash Pond (BAP) – Cease Burning Coal and Complete Closure by October 17, 2028

- Flint Creek Primary BAP- Complete Closure by February 28, 2023
  - Pirkey East BAP- Complete Closure by January 2023
  - Pirkey West BAP- Complete Closure by October 17, 2023
- e. All plants must comply by a date to be established in each facility's National Pollutant Discharge Elimination System (NPDES) wastewater permit. The latest possible date allowed under the current ELG rule is December 31, 2025. However, an option is available in the rule to allow the plant to cease combustion of coal (i.e., retire or repower) and to continue to operate without further ELG-related retrofits until no later than December 31, 2028. We have filed permit requests to reflect site-specific dates under this revised framework that became effective in December 2020.
- The current permit for Flint Creek is based on the prior ELG rule and contains a date of December 31, 2023. We have filed a request to indicate the date should be revised to November 30, 2022.
  - The current permit for Welsh similarly contains a date of December 31, 2023 based on the prior rule. We have filed a request to modify the permit to reflect that the facility will permanently cease coal combustion on or before December 31, 2028, and therefore no technology retrofits are required.
  - The current permit for Pirkey contains no relevant date, but is in the renewal process with the state agency. We have filed information that the facility will permanently cease coal combustion on or before October 17, 2023, and therefore no technology retrofits are required.
- f. In the CCR+ELG Expenditure scenario both CCR and ELG compliance costs were included. In the No CCR Expenditure scenario, no CCR or ELG compliance costs were not included. In the CCR Expenditure scenario, only CCR compliance costs were included.

Prepared By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

**SOAH DOCKET NO. 473-21-0538**  
**PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA CLUB'S THIRD SET OF REQUESTS FOR INFORMATION**

**Question No. Sierra Club 3-3:**

Refer to SWEPCO response to Sierra Club 1-8, Highly Sensitive Attachment 1.

- a. Provide the date that the projection was created.
- b. Provide any post-processing workbooks used by the Company to evaluate the model outputs.
- c. Provide the outputs provided in Attachment 1 for any alternative scenarios evaluated using a CO2 price.
- d. Regarding the power market price forecast used to conduct the analysis.
  - i. Provide the forecast.
  - ii. State the source of the power market price forecast.
  - iii. State the date the forecast was created.
  - iv. If the forecast is from a source other than AEP, explain why an alternative forecast was used.
- e. Regarding the commodity price forecast used to conduct the analysis.
  - i. Provide the forecast.
  - ii. State the source of the commodity price forecast.
  - iii. State the date the forecast was created.
  - iv. If the forecast is from a source other than AEP, explain why an alternative source was used.

**Response No. Sierra Club 3-3:**

- a. The data provided in SC 1-8 Highly Sensitive Attachment 1 was created in October 2020.
- b. Please see SC 2-2 for the post processing workbooks used by the Company to evaluate the model outputs.
- c. The outputs provided in SC 1-8 Highly Sensitive Attachment 1 were evaluated using a CO2 price.
- d.
  - i. Please see the response to CARD 2-10 for the market forecasts used to conduct the analysis
  - ii. Please see the response to SC 2-2 e.
  - iii. The market price forecast was generated in late September 2020.
  - iv. Please see the response to SC 2-2 e.
- e.
  - i. Please see the response to CARD 2-10 for the commodity forecasts used to conduct the analysis
  - ii. Please see the response to SC 2-2 e.

- iii. The commodity price forecast was generated in late September 2020.
- iv. Please see the response to SC 2-2 e.

Prepared By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

Sponsored By: Amy E. Jeffries

Title: Dir Regulated Infrstr Dev

**SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA  
CLUB'S THIRD SET OF REQUESTS FOR INFORMATION**

**Question No. Sierra Club 3-4:**

Refer to Company response to CARD 2-2, and the Company's projection of excess capacity reserves during much of the next decade.

- a. Indicate whether the Company plans to sell any of this excess capacity as a firm capacity product.
  - i. If yes, indicate whether a sale has been finalized.
  - ii. Provide the price and quantity sold or expected to be sold.
- b. Indicate whether the Company sold firm capacity any years between 2015 – 2020.
  - i. If yes, provide the quantity of capacity sold and the price (\$/MW) received from these sales each year.
- c. During the test year, indicate whether the Company sold firm capacity.
  - i. If yes, provide the quantity of capacity sold and the price (\$/MW) received from these sales each year.

**Response No. Sierra Club 3-4:**

- a. i., ii. The Company has no plans to sell any of this excess capacity as a firm capacity product. With the Company's planned retirement of Dolet Hills and the announcement last November concerning CCR compliance, SWEPCO no longer will be in an excess capacity position. In fact, SWEPCO is projecting the need to add capacity beginning in 2023.
- b. i. CONFIDENTIAL
- c. i. The Company did not sell any firm capacity during the test year.

The information responsive to subpart b is CONFIDENTIAL MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Sponsored By: Thomas P. Brice

Title: VP Regulatory & Finance

Sponsored By: Scott E. Mertz

Title: Regulatory Consultant Staff